

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN DIVISION**

**SAMANTHA CONNER**

**PLAINTIFF**

**v.**

**CIVIL ACTION NO. 3:20-CV-57-MPM-RP**

**ALLTIN, LLC.; JAMES E. BROOKS;  
KEVIN CASTEEL; WILLIE A. “SONNY”  
SANDERS, in his official capacity as the  
duly elected constable of Lowndes County,  
and WILLIE A. “SONNY” SANDERS, in  
his individual capacity**

**DEFENDANTS**

**MOTION FOR JUDGMENT ON THE PLEADINGS**

**COMES NOW** Defendant, **WILLIE A. “SONNY” SANDERS**, in his official and individual capacities, and moves for dismissal of Plaintiff’s Federal Law Claims.

1. Plaintiff filed her Second Amended Complaint on June 17, 2020. **[Doc. 51]**.
2. In it, she alleges violations of federal law against the Defendant, **WILLIE A. “SONNY” SANDERS**, in his official and individual capacities.
3. Plaintiff’s Second Amended Complaint fails to allege relief against the Defendant which is plausible on its face.
4. Moreover, Defendant is entitled to qualified immunity on all Plaintiff’s claims. As such, Defendant moves this Court to dismiss the federal law claims in Plaintiff’s Second Amended Complaint.
5. In support of dismissal, an appropriate memorandum of supporting authorities is being filed.

**WHEREFORE**, Defendant **WILLIE A. ‘SONNY’ SANDERS** prays that the Court dismiss the federal law claims in Plaintiff’s Second Amended Complaint pursuant to Fed. R. Civ. Proc. 12(c).

**RESPECTFULLY SUBMITTED** this the 2<sup>nd</sup> day of October, 2020.

**JACKS |GRIFFITH |LUCIANO, P.A.**

By: /s/ **Bethany A. Tarpley**  
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**CERTIFICATE OF SERVICE**

I, Bethany A. Tarpley, attorney of record for Defendant Sanders, do hereby certify that I have this day caused a true and correct copy of the above and foregoing *Motion to Dismiss Federal Claims* to be delivered by the ECF Filing System which gave notice to the following:

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**DATED** this 2<sup>nd</sup> day of October, 2020.

/s/ **Bethany A. Tarpley**  
Bethany A. Tarpley